

### **REMARKS**

Applicants thank the Examiner for the very thorough consideration given the present application.

Claims 1-25 are now present in this application. Claims 1, 15 and 22 are independent.

Claims 1, 15, 22 and 25 have been amended. Reconsideration of this application, as amended, is respectfully requested.

### **Rejection Under 35 U.S.C. § 112, 2<sup>nd</sup> Paragraph**

Claims 1-25 stand rejected under 35 U.S.C. § 112, 2<sup>nd</sup> Paragraph. This rejection is respectfully traversed.

The Examiner has asserted that the description of the edges for the gate line and the data line cannot be found in specification. While the Applicants reserve the right to describe the edges for the gate line and data line in the specification as shown in the drawings, the Applicants have cancelled the recitation from the claims.

Applicants respectfully submit that the claims, as amended, particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

**Rejections under 35 U.S.C. §103**

Claims 1-2, 11-16 and 22-25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Kim in view of Hiraishi, and claims 3-4, 6-8, 10, 17-19 and 21 stand rejected over Kim and Hiraishi, and further in view of Ohtsu. These rejections are respectfully traversed.

Complete discussions of the rejections are set forth in the Office Action and are not being repeated here.

It is noted here that Kim, previously a secondary reference, is now a primary reference.

While not conceding the appropriateness of the Examiner's rejection, but merely to advance prosecution of the instant application, Applicants respectfully submit that independent claim 1 has been amended to recite a combination of elements in a liquid crystal display (LCD) including a pixel electrode having portions thereof formed on the surface of the passivation layer but not over the thin film transistor; and an upper substrate located above the pixel electrode, wherein an area between said pixel electrode and said upper substrate, and above said low reflective layer, is free of any black matrix or light shielding layer.

Applicants respectfully submit that this combination of elements as set forth in independent claim 1 is not disclosed or made obvious by the prior art of record, including Kim.

With regard to Kim, the Examiner has cited figures 1-6, which depict various embodiments. The Applicants submit that each embodiment shown in figures 1-6 includes a black matrix or light shielding layer (though not shown) on the upper substrate. An object of the Applicants' claimed invention is to exclude the black matrix or light shielding layer on the upper substrate. Since every embodiment of the portion of Kim cited by the Examiner includes a black matrix on the upper substrate, the Kim reference must be withdrawn.

Referring to the portion of Kim in Col.1, line 65 to Col.2, line 12, key features of a method for manufacturing the conventional LCD shown in these figures are disclosed. Particularly, Kim provides as follows:

Second, a method for manufacturing a conventional AMLCD is reviewed. Two transparent substrates are prepared to construct an LCD. In general, the substrates are made of non-alkaline or soda glass. Different processes are applied to the two substrates. ***On the first substrate (upper plate), a color filter layer, a black matrix, common electrodes, and bus lines are formed.*** On the second substrate (lower plate), switching elements such as TFTs, pixel electrodes, and bus lines are formed.

This invention particularly relates to a second substrate of an AMLCD, on which TFTs are formed. Therefore, conventional methods for manufacturing the second substrate will be mainly described below.

Kim, Col.1, line 65 to Col.2, line 12

Since all of the embodiments have a black matrix on the first substrate, this fact is stated once, and the rest of the discussion is directed to the construction of the second substrate. It is also submitted that every embodiment disclosed in Kim

has a black matrix or light shielding layer on the upper substrate. Therefore, a combination which includes a black matrix does not meet the features of the Applicants' claims.

With regard to Hiraishi, the Applicants submit that in each embodiment shown, a portion of a pixel electrode is extended to cover the TFT (as a light shielding layer), or a light-shielding layer or black matrix is provided on the upper substrate. If the pixel electrode is extended, then the black matrix is excluded. If the black matrix is provided, then there is no extension of the pixel electrode. The Hiraishi reference must also be withdrawn.

This is because the Applicants' claimed invention excludes both the light shielding layer/black matrix on the upper substrate, and the portion of the pixel electrode extended to cover the TFT (to serve as a light shielding layer therefor).

In particular, neither Kim, nor Hiraishi discloses or suggests a combination of elements in a liquid crystal display (LCD), including a pixel electrode having portions thereof formed on said passivation layer but not over the thin film transistor, and an upper substrate located above the pixel electrode, wherein an area between said pixel electrode and said upper substrate, and above said low reflective layer, is free of any black matrix or light shielding layer, as recited in independent claim 1, as amended, or a combination of elements in a method of manufacturing a liquid crystal display, including forming a pixel electrode with portions thereof on the surface of the passivation layer, but not over the thin film

transistor; and forming an upper substrate above the pixel electrode, wherein an area between said pixel electrode and said upper substrate, and above said low reflective layer, is free of any black matrix or light shielding layer, as recited in independent claim 15, and similarly stated in independent claim 22. Ohtsu cannot supply the deficiencies of Kim and Hiraishi.

Claims 2-14, 16-21 and 23-25 depend, either directly or indirectly on independent claims 1, 15, and 22. Since neither Kim, nor Hiraishi, nor Ohtsu discloses or suggests the above-recited features of independent claims 1, 15 and 22, Kim, Hiraishi and Ohtsu, either singly, or in combination cannot render claims 1-25 obvious to one of ordinary skill in the art. Reconsideration and withdrawal of these art grounds of rejection are respectfully requested.

### **Conclusion**

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone Percy

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L. Square, Registration No. 51,084, at (703) 205-8034, in the Washington, D.C. area.

Prompt and favorable consideration of this Amendment is respectfully requested.

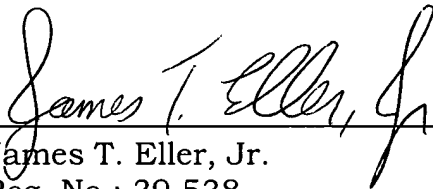
Attached hereto is a marked-up version of the changes made to the application by this Amendment.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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